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13 *Proposed Counsel for Robert E. Atkinson, Trustee*

14 **UNITED STATES BANKRUPTCY COURT**

15 **DISTRICT OF NEVADA**

16 In re:

17 NAJM MOOSAVI GHARAVI,

18 Debtor.

19 Case No.: 20-10478-MKN  
20 Chapter 7

21 **NOTICE OF HEARING ON MOTION TO**  
22 **(I) PERMANENTLY EXEMPT DEBTOR**  
23 **FROM CREDIT COUNSELING**  
24 **REQUIRED UNDER 11 U.S.C. § 109(h)(4);**  
25 **(II) PERMANENTLY EXEMPT DEBTOR**  
26 **FROM PARTICIPATION IN FINANCIAL**  
27 **MANAGEMENT TRAINING COURSE**  
**REQUIRED UNDER 11 U.S.C. § 727(a)(11);**  
**AND (III) EXCUSE DEBTOR'S**  
**APPEARANCE AT THE SECTION 341(a)**  
**MEETING OF CREDITORS REQUIRED**  
**UNDER 11 U.S.C. § 343**

Hearing Date: May 28, 2020  
Hearing Time: 11:00 a.m.



**TO: ALL INTERESTED PARTIES**

**NOTICE IS HEREBY GIVEN** that Robert E. Atkinson, the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case (the “Trustee”), by and through the Trustee’s proposed counsel, hereby submits this *Motion to (i) Permanently Exempt Debtor from Credit Counseling Required Under 11 U.S.C. § 109(h)(4); (ii) Permanently Exempt Debtor from Participation in Financial Management Training Course Required Under 11 U.S.C. § 727(a)(11); and (iii) Excuses Debtor’s Appearance at the Section 341(a) Meeting of Creditors Required Under 11 U.S.C. § 343* (“Motion”). Through the Motion, the Trustee seeks entry of an order that permanently exempts Debtor Najm Moosavi Gharavi (“Debtor”) from having to attend and complete a credit counseling course prepetition and/or having to participate in a financial management training course post-petition, and that excuses the Debtor’s appearance at the Section 341(a) meeting of creditors.<sup>1</sup>

**NOTICE IS FURTHER GIVEN** that any opposition to the relief requested in the Motion must be filed pursuant to Local Rule 9014(d)(1), which provides:

. . . any opposition to a motion must be filed, and service of the opposition must be completed on the movant, no later than fourteen (14) days preceding the hearing date for the motion. The opposition must set forth all relevant facts and any relevant legal authority. An opposition must be supported affidavits or declarations that conform to the provisions of subsection (c) of [Local Rule 9014].

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court. You *must* serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

**NOTICE IS FURTHER GIVEN** that a hearing on the above-referenced Motion will be held before a United States Bankruptcy Judge, at the Foley Federal Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada, on **May 28, 2020, at the hour of 11:00 a.m.**

<sup>1</sup> All capitalized terms used herein are as defined in the Motion unless otherwise stated.

1       **NOTICE IS FURTHER GIVEN** that the hearing on this matter may be continued from time  
2 to time without further notice.

3       Dated this 16th day of April, 2020.

4                               Respectfully submitted by:

5                               **ANDERSEN LAW FIRM, LTD.**

6       By:    /s/ Ryan A. Andersen  
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14                               *Proposed Counsel for Robert E. Atkinson, Trustee*

